

**Donald D. duBoulay**  
Attorney at Law

Telephone: (212) 966-3970  
Fax: (212) 941-7108  
E-mail: [dondubesq@aol.com](mailto:dondubesq@aol.com)

**305 Broadway, Suite 602**  
New York, NY 10007

January 14, 2020

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Hammatt (Christopher Hammatt)  
19 Cr. 067 (PGG)

Dear Judge Gardephe:

I write on behalf of Christopher Hammatt to respectfully request a modification of Mr. Hammatt's bail condition to allow him to obtain employment as a long Haul truck driver which would necessitate travel throughout several States.

Mr. Hammatt bail conditions were set at his initial appearance before this Court, inter alia as follows: the execution of a personal recognition bond in the amount of \$100,000.00 strict pretrial supervision and travel restricted to the EDNY, SDNY and the Central District of California. His pretrial supervision has since been amended to regular supervision.

Mr. Hammatt has obtained an employment offer as a Long haul truck driver, a job he held prior to his arrest in this matter. If permitted to travel he would be employed by LogiFlex on a semi-dedicated route. He may be required to travel for training and to pick up and drop off loads in Oakland CA, Houston, Dallas, Chicago, Detroit, Dayton Ohio and possibly Biloxi Miss. At all times he would be in daily contact with his pretrial officer by telephone and e-mail.

Pre-trial officer Tiffany Rivers (District of Ca.) does not object to this request. She confirms that Mr. Hammatt has fully complied the terms of his release bond and states that a location monitoring device is not necessary, but if the court wishes she can outfit Mr. Hammatt with a GPS electronic device (bracelet) to ascertain his location at all times. Mr. Hammatt avers that the trucking company has a GPS device on their trucks and his location can always be ascertained in this manner also. He will also give the pretrial officer his dated itinerary prior to the requested travel.

Pre-trial office Lea Harmon of the Southern District of New York, defers to the court's discretion. The Government would request location monitoring if the court grants this request.

Respectfully submitted,  
/s/

Donald duBoulay

cc: Nicholas Chiuchiolo, Esq, AUSA  
Tiffany Rivers, Pretrial Services Officer